

CONFIDENTIAL WITNESS APPENDIX¹

CW No.	POSITION & TENURE	JOB DESCRIPTION/RELEVANT RESPONSIBILITIES
CW1	<p>Area Manager Reliability Maintenance & Business Improvement Maintenance, Cliffs</p> <p>(2011 – September 2013)</p>	<p>CW1 was Superintendent of the plant and Bloom Lake and was responsible for reporting planning and engineering issues.</p> <p>CW1 reported to Ken Holsten, one of the two General Managers at Bloom Lake, who in turn reported to Defendant David Blake.</p>
CW2	<p>Exploration Manager – Eastern Canada</p> <p>(December 2011 – February 2013)</p> <p>Senior Resource Development Geologist</p> <p>(January 2007 – December 2011)</p> <p>Senior Mine Geologist, Portman Iron Ltd.</p> <p>(January 2005 – January 2007)</p>	<p>CW2 was responsible for geological surveys at Bloom Lake.</p> <p>In this capacity, CW2 attended technical meetings with engineers and geologists at Bloom Lake at least once a month. At these meetings, attendees would discuss geology, exploration programs, and ways to improve the mining process.</p>
CW3	<p>Supervising Senior – Internal Audit, Cliffs</p> <p>(December 2008 – September 2012)</p>	<p>CW3 worked in Cliffs' Cleveland headquarters and reported directly to Cliffs' Director of Internal Audit.</p>

¹ The information contained in this Appendix is based on the information provided by each Confidential Witness to Lead Plaintiff's counsel.

CW No.	POSITION & TENURE	JOB DESCRIPTION/RELEVANT RESPONSIBILITIES
CW4	Global Capital Analyst, Cliffs (September 2010 to April 2014)	CW4 worked out of Cliffs' Cleveland headquarters and was responsible for processing capital projects. CW4 reported to Cliffs' Manager of Capital Process & Business Improvement and Senior Analyst Business Improvement.
CW5	Financial Systems Contractor, Cliffs (2011 – January 2013)	CW5 assisted with the transition following the Bloom Lake acquisition. CW5 was responsible for setting up a work management system for the expansion project at Bloom Lake that would log construction costs and keep track of vendor and contractor accounts.
CW6	Vice President Senior Project Director of Canadian Chromite Operations, Cliffs (4 th Quarter 2010 to 1 st Quarter 2012)	CW6 attended Cliffs' briefings in Cleveland, including economic briefings, at least once a month. These meetings were also attended by members of senior management.

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CW7	<p>International Tax Director, Cliffs</p> <p>(April 2011 – March 2013)</p>	<p>CW7 worked with Cliffs' Treasury Department in connection with global cash management and regularly interacted with senior managers in Finance, Treasury, and Accounting, as well as the Executive Staff.</p> <p>CW7 was required to make tax calculations that involved looking into Cliffs' price forecasting.</p> <p>CW7 was aware of research done regarding the dividend and had direct knowledge of deficiencies with Cliffs' pricing models and senior executives' awareness of these problems.</p>
CW8	<p>Manager, Global Treasury Credit & Systems, Cliffs</p> <p>(December 2011 – May 2012)</p> <p>Treasury Manager, Cliffs (February 2011 – December 2011)</p> <p>Assistant Treasury Manager, Cliffs (September 2008 – February 2011)</p>	<p>CW8 reported to Matt Bittner, then an Assistant Treasurer, and currently Cliffs' Vice President and Treasurer.</p>

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CW9	Chief Metallurgist, Bloom Lake (April 2010 – September 2012)	<p>CW9 headed the laboratory team for ore quality and was responsible for improving performance in the plant and increasing the tons per hour of ore processed.</p> <p>CW9 has 20 years of experience in the mining industry and has a bachelor's degree in metallurgy.</p>
CW10	Financial Controller, Wabush (1998 – November 2011)	<p>CW10 was a financial controller for Wabush mines and regularly attended meetings in Montreal during which all of Cliffs' Canadian iron ore operations were discussed, including Bloom Lake. These meetings took place approximately every two to three weeks, were attended by representatives from Cliffs' headquarters, and issues concerning budgeting, production estimates, and equipment issues were discussed.</p>
CW11	Chief Equipment Manager, Bloom Lake (August 2011 – May 2013)	<p>CW11 worked as a plant team leader at Bloom Lake. CW11's work was affected due to concentrator shutdowns.</p> <p>CW11 was responsible for sending soil samples for testing and for equipment repair at Bloom Lake.</p>
CW12	Process Engineering Intern, Processing Engineering Department, Cliffs (May 2011 – September 2011)	<p>CW12 worked at Bloom Lake and was responsible for optimizing plant output and quality.</p>

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CW13	Systems Integration Engineer, Bloom Lake (January 2009 – Present)	CW13 is a contractor with CLM Consultants who worked on the Bloom Lake project. CW13 was responsible for programming the graphics and user interface of the machines used in the plant so that the operators can run them.
CW14	Supervisor of Warehouse, Bloom Lake (April 2010 – October 2010)	CW14 was responsible for building the warehouse for Bloom Lake. CW14 has more than 30 years of experience in the mining industry.
CW15	Consultant at Bloom Lake (Fall 2010 – Summer 2011)	CW15 acted as a consultant for Bloom Lake. CW15 was tasked with working on a large project to improve Phase 1 at Bloom Lake, including calculating and analyzing plans for Bloom Lake's pumping station.
CW16	Construction Coordinator Bloom Lake Phase II, Management Control L. Nardella Associates Ltd. (May 2010 – December 2012)	CW16 was responsible for overseeing the scheduling and planning for Phase 2 of the Bloom Lake expansion. In this capacity, CW16 supervised approximately 500 employees at Bloom Lake. CW16 was responsible for creating budget estimates, and for reporting those estimates directly to Pascal Vallée, who reported to Cliffs' headquarters in Cleveland.

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CW17	Business Analyst – Resource Management, Cliffs (November 2002 – September 2013)	<p>CW17 was based in Cliffs' Cleveland headquarters.</p> <p>CW17 was responsible for overseeing the IT budget for Bloom Lake.</p> <p>CW17 reviewed resource reports from Bloom Lake, paying special attention to project end dates and costs.</p> <p>When CW17 encountered overages, CW17 reported the overages to IT management, including the Chief Information Officer, who was supposed to pass along the reports to Cliffs' CFO.</p>
CW18	Senior Project Manager, Cliffs (March 2011 – September 2013)	<p>CW18 worked in Cliffs' Operational Technology Department in Cleveland and was hired by Cliffs to help with the expansion at Bloom Lake.</p> <p>CW18 reported directly to Bernard Noel, the Director of IT at Bloom Lake.</p> <p>CW18 was tasked with gathering all of the operational data from Bloom Lake.</p> <p>CW18 visited Bloom Lake on two separate occasions, during which CW18 was given tours of the facilities.</p>
CW19	Coordinator for Mechanical Maintenance, Bloom Lake/Wabush (June 2010 – April 2013)	<p>CW19 started with Consolidated Thompson and transitioned to Cliffs when the Bloom Lake acquisition closed in May 2011.</p>

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CW20	Maintenance of Plant & Railway, Wabush (June 2008 – December 2011)	CW20's job responsibility was to ensure the maintenance of the Wabush plant and the Wabush/Bloom Lake railway. CW20 scheduled and supervised the maintenance and improvement projects on the railway, in particular wagon repair.
CW21	Wagon Maintenance Coordinator, Bloom Lake (July 2005 – January 2012)	CW21 managed Bloom Lake's wagon maintenance and operations teams, which alerted CW21 to product and transportation issues at the mine.
CW22	Section Supply Chief, Bloom Lake (December 2009 – January 2014)	CW22 started working at Bloom Lake prior to Cliffs' acquisition of the mine. CW22 worked on Phase 2 of the Bloom Lake expansion. CW22 reported to Pascal Vallée, Expansion General Manager for Cliffs Natural Resources at Bloom Lake from 2012-2013.
CW23	Senior Vice President of Logistics, Mine Development and Operations, Cliffs (2010-2012) Vice President Development, Consolidated Thompson (2006-2010)	CW23 was in charge of the technical aspects of the Bloom Lake mine site before Cliffs acquired it. After the acquisition, CW23 was in charge of the Phase 2 expansion. CW23 reported directly to David Blake. CW23 has over 30 years of experience in the mining industry.

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CW24	<p>Manager Enterprise Risk Management, Cliffs</p> <p>(November 2010 – April 2011)</p>	<p>CW24 reported to the Director of Enterprise Risk Management, who reported to the Chief Risk Officer.</p> <p>CW 24 oversaw the due diligence process regarding the Bloom Lake acquisition. CW24's job responsibilities included leading a team of senior executives that developed a work plan for how to perform due diligence in connection with the acquisition.</p>
CW25	<p>Senior Project Manager, Cliffs</p> <p>(July 2006 – September 2013)</p>	<p>CW25 was the Program Manager for IT integration at Bloom Lake – the IT Department at Bloom Lake reported to CW25.</p> <p>CW25 worked out of the Cleveland headquarters, but visited the Bloom Lake facility.</p>
CW26	<p>Mine Manager, Bloom Lake</p> <p>(2012 – January 2013)</p>	<p>CW26 reported directly to Ken Holsten, a General Manager at Bloom Lake.</p> <p>CW26 was an equipment maintenance team leader, as well as a team leader for the operation and development of the mine.</p>

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CW27	<p>Senior Director of Global Tax, Cliffs</p> <p>(May 2012 – September 2013)</p>	<p>CW27 was based in Cliffs' Cleveland headquarters.</p> <p>CW27 was responsible for tax reporting for Cliffs' Canadian divisions and reviewed revenue figures from Bloom Lake to determine whether the operations would continue to pay taxes in Canada. These revenue reports were also distributed to Cliffs' CFOs, Defendants Brlas and Paradie.</p>
CW28	<p>Manager – Financial Systems/Process Management Training and Strategy, Cliffs</p> <p>(April, 2011 – September, 2013)</p>	<p>CW28 was responsible for the overall global training function of the finance arena and other relevant arenas throughout the Company.</p> <p>CW28 visited Bloom Lake.</p>